

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

RECEIVED

OCT 27 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
To Ensure Compatibility with) RM-8143
Enhanced 911 Emergency Calling Systems)

To: The Commission

REPLY COMMENTS OF AMERITECH

Ameritech Corporation (Ameritech), by its attorneys, respectfully submits these reply comments concerning the Public Notice, Additional Comments Sought in Wireless Enhanced 911 Reconsideration Proceeding Regarding Rules and Schedules, DA 97-2751, released Oct. 3, 1997. Ameritech specifically has concerns about the comments filed by TruePosition, Inc. (TruePosition) on October 17, 1997.

TruePosition states that in a recent nationwide poll, the respondents stated that they would be willing to pay an average of \$3.30 per month for E911 location technology. TruePosition Comments at 2. In its Comments and in its September 10, 1997 Ex Parte Letter in this docket, TruePosition does not indicate how its sampling was done. It states only that a poll was taken of 800 wireless telephone users and people who considered buying a wireless telephone in the past year. Although it asserts that there is a 4% margin of error, that margin is meaningless without knowing how the sampling was done. Were the users all cellular users, PCS users, SMR users, or some combination of the three? Were the people who considered buying a wireless telephone considering cellular, PCS or SMR? Was the sample representative

No. of Copies rec'd
List ABCDE

0410

of the socio-economic groups in the United States? Was the sample representative of different geographic areas? How was the question phrased when the respondents were asked how much they were willing to pay for E911 location technology? Were the people polled in decision-making positions within their households or businesses? Were they responsible for making the payments, or were they using a service paid for by someone else? TruePosition does not provide answers to any of these questions.

In its Comments, TruePosition fails to note that its survey shows that 31% of the 560 wireless users surveyed said that if they had to pay \$1.50 per month for E911 technology, they would consider changing, or would change, to another carrier. TruePosition Ex Parte Letter at 6. TruePosition also fails to note that its survey shows that 30% of the 240 respondents who considered buying a wireless telephone would consider using a different cellular carrier if the cellular company were to charge \$1.50 per month for E911 service.

TruePosition also asserts that 71% of the survey respondents stated that \$1.50 is a "fair price" to pay. TruePosition Ex Parte Letter at 5. But TruePosition does not say how the corresponding question was worded.

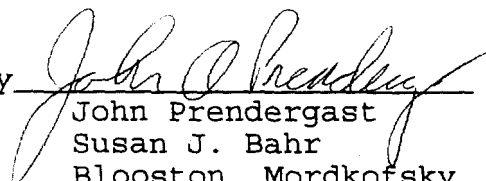
Through its pleadings in this docket, Ameritech has expressed its concerns about how costs will be recovered for all parties involved in the provision of E911 services. Ameritech, nevertheless, suggests that the Commission should obtain more information about TruePosition's survey techniques before giving any credence to the results. An undefined sample of 560 users of

unknown wireless services should not influence the rates that all affected carriers across the country charge for E911 service. Ameritech is concerned that Commission policy should not be based on unrealistic expectations of public demand for a service, because the industry should not be placed in a position of investing substantial resources, only to find that its ability to recover the costs of technology development has been significantly overestimated.

For these reasons, Ameritech submits that the Commission should not rely on the conclusions of TruePosition's survey, in the absence of additional information allowing the Commission to verify that the survey is reliable.

Respectfully submitted,

AMERITECH CORPORATION

By 
John Prendergast
Susan J. Bahr
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, NW
Washington, DC 20037
(202) 659-0830

Its Counsel

Filed: October 27, 1997

CERTIFICATE OF SERVICE

I Elizabeth A. Ohr, a legal secretary in the law firm of Blooston, Mordkofsky, Jackson & Dickens hereby certify that on the 27th day of October, 1997, copies of the foregoing "Reply Comments of Ameritech" were deposited in the U.S. mail, postage prepaid, addressed to:

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, DC 20554

Rosalind K. Allen, Deputy Bureau
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

David Furth, Chief
Commercial Wireless Division
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

Gunnar D. Halley
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

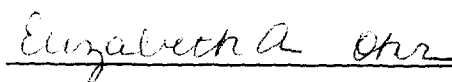
Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, D.C. 20554

David M. Don
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036

Dan Phythyon, Chief
Wireless Telecommunications
Commission
Federal Communications Commission
2025 M Street, N.W.
Room 5002
Washington, D.C. 20554

Won Kim
Wireless Telecommunications
Federal Communications Commission
2025 M Street, N.W. Room 5202
Washington, D.C. 20554

Philip L. Verveer
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036



Elizabeth A. Ohr